



DLA Piper LLP (US)
200 South Biscayne Boulevard
Suite 2500
Miami, Florida 33131-5341
www.dlapiper.com

Christopher George Oprison
chris.oprison@dlapiper.com
T 305.423.8522
F 305.657.6366

January 30, 2023

VIA EMAIL TO CHAMBERS

Hon. Ona T. Wang
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312
Wang_NYSDChambers@nysd.uscourts.gov

**Re: Motion to Seal Transcript of December 13, 2022 Pre-Motion Conference in
Potter v. Beacon Intercontinental Group et al., No. 20-cv-4599-JGK-OTW**

Dear Judge Wang:

We write on behalf of Defendants/Counterclaim Plaintiffs Business Insurance Holdings, Inc. and Beacon Intercontinental Group, Inc. (collectively “Defendants”) to request that the Court designate the transcript of this Court’s December 13, 2022 pre-motion conference. On January 9, 2023, the transcript was finalized, and the Court noted that any redaction requests should be filed by January 30, 2023. *See* Doc. No. 134.

During the December 13 pre-motion conference, the parties discussed sensitive materials that are now the subject of Plaintiff’s pending motion to reduce confidentiality designations, which was filed under seal on January 20, 2023. *See* Doc. No. 138. Plaintiff’s motion was fully briefed as of Friday, January 27, 2023. In light of the sensitive matters discussed during the conference, and the as-yet unresolved issues regarding the appropriate designation, Defendants respectfully request that the transcript be subject to “Attorneys Eyes Only” designation in its entirety for the time being. Defendants submit that this designation is appropriate unless and until the Court rules that a reduced designation is appropriate for some or all of the matters discussed at the December 13 hearing, at which time the designation of the transcript can be made consistent with the Court’s ruling.

Thank you for your continued attention in this matter.

Respectfully submitted,

/s/ Christopher Oprison
Christopher George Oprison

cc: All Counsel of Record